



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
100 F. Street N.E. SPIII
Washington, D.C. 20549

DIVISION OF
ENFORCEMENT

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December 20, 2016

Via UPS & ECF

Hon. Richard J. Sullivan
U.S. District Court
40 Foley Square, Room 2104
New York, NY 10007

Re: SEC v. Bassily, Case No. 16-CV-2733 (RJS)

Dear Judge Sullivan:

Plaintiff Securities and Exchange Commission submits this letter to inform the Court that, in the interests of efficiency and judicial economy, it intends to amend the Complaint to allege additional facts relating to the domestic nature of the transactions at issue in this action, including those discussed at the oral argument held on December 14, 2016. There have been no prior amendments or requests for leave to amend. Under Federal Rule of Civil Procedure 15(a)(2), when the time for amending as of right has expired, a party may amend only with the opposing party's written consent or the court's leave, which should be freely given when justice so requires. Counsel for plaintiff has conferred with counsel for defendant, who consented in writing to the filing of an amended complaint no later than January 18, 2017.

We submit that the Commission's proposed deadline of January 18, 2017 is reasonable, given the complexity and breadth of the scheme, which involved numerous victims, transactions, and acts of fraud and millions of dollars in losses. The Commission will proceed accordingly unless otherwise ordered by the Court.

Very respectfully,

A handwritten signature in black ink, appearing to read "Tom A. Bednar", written over a horizontal line.

Thomas A. Bednar

cc: Counsel for Defendant